

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

<b>Ivonne Robles Colón, et al</b>  <b>Plaintiffs,</b>  <b>v.</b>  <b>Mitsubishi Motors Corp.,</b>  <b>v.</b>  <b>Julio Robles Sánchez, et al</b>	<b>CIVIL NO. 96-2296 (SEC)</b>
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**MOTION REQUESTING WITHDRAWAL OF FUNDS  
BELONGING TO MINOR EDUARDO HERNANDEZ ROBLES**

**TO THE HONORABLE COURT:**

**COME NOW** plaintiffs Luis Hernández Reyes and Ivonne Robles Colón by their undersigned attorney and states and requests as follows:

**I.**

The instant case was filed by plaintiffs on October 23, 1996 personally and on behalf of their minor child Eduardo Hernández Robles, then 10 years old.

**II.**

On December 15, 1998, judgment was entered in the global amount of \$30,000, of which \$18,000 were for minor Eduardo Hernández Robles, as per a Stipulation of Settlement filed by the parties. Docket Entry Number 31. Thereafter, on January 7<sup>th</sup> and 14<sup>th</sup> of 1999, \$5,000 and \$8,500, respectively were consigned in the Registry of the Court for the benefit of minor Eduardo Hernández Robles. The balance of \$4,500, equivalent to 25% of \$18,000, was paid to the undersigned attorney as attorney fees.

**III.**

Minor Eduardo Hernández Robles was born January 8, 1987 and, thus, is now 17 years old. He lives with his parents in Fajardo, Puerto Rico and has recently graduated from high school with outstanding grades. (Exhibit 1- copy of Transcript from Escuela Evangélica

*Jms*

Unida de Fajardo).

On June 2, 2004, Eduardo received a letter from the University of Puerto Rico at Humacao notifying him that he had been accepted to its Management Program. (Exhibit 2). Tuition, books, study materials and miscellaneous expenses for the first year amount to \$3,545. (Exhibit 3.) Eduardo will need to purchase a motor vehicle in order to travel from Fajardo to Humacao to study at the University of Puerto Rico in Humacao. Eduardo has visited with his parents several car dealerships looking for a used reliable vehicle that can be purchased by his parents and that Eduardo can have the exclusive use to travel from Fajardo to Humacao and back to Fajardo in order to pursue his university studies. Exhibits 4 and 5 are quotations from La Mina Auto Sales, Inc. for a 1998 and a 1999 Volkswagen Jetta, in the amounts of \$8,000 and \$8,900, respectively.

The appearing plaintiffs, parents of minor Eduardo Hernández Robles, do not have the financial means of paying the cost of the yearly tuition of their son nor the purchase price of a motor vehicle for their son. In the year 2002, their gross income was \$13,148 and in 2003, \$14,223. (Exhibits 6 and 7.)

#### **IV.**

Plaintiffs Luis Hernández Reyes and Ivonne Robles Colón request on behalf of their son Eduardo Hernández Robles and for his sole benefit, that he be allowed to withdraw from the consigned funds the amount of \$8,900 for the purchase of a motor vehicle and the amount of \$3,545 for tuition, books, study materials and miscellaneous expenses for the first year.

In San Juan, Puerto Rico, this 17th day of June, 2004


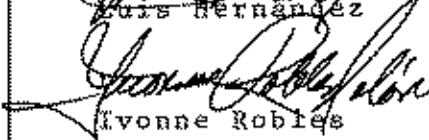
#### **UNSWORN STATEMENT PURSUANT TO 28 USC 1746**

We, Luis Hernández Reyes and Ivonne Robles Colón, hereby certify, under penalty of perjury that the foregoing is true and correct:

1. That we are of legal age, married, and residents of Fajardo, Puerto Rico.

2. That we are the parents of minor Eduardo Hernández Robles, currently 17 years old.
3. That after consulting with our son, we have requested our attorney to file the instant Motion Requesting Withdrawal of Funds Belonging to Minor Eduardo Hernández Robles. That said Motion was translated to us from English to Spanish by our attorney and everything stated in the Motion is true and correct.
4. It is our belief that our son will be benefited from the Court's approval of the withdrawal of the requested funds which are to be used for the sole benefit of our son, Eduardo Hernández Robles.

In San Juan, Puerto Rico, this 17th day of June, 2004.

  
Luis Hernández  
  
Ivonne Robles

  
**JORGE MIGUEL SURO BALLESTER, ESQ.**  
**USDC-PR 121713**

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